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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

VERONICA MCLEOD, individually and as
successor in interest to decedent, DOLORES
HERNANDEZ; AMADO HERNANDEZ,
individually and as successor in interest to
decedent, DOLORES HERNANDEZ; and
YSIDRA REGALDO, individually,

Plaintiffs,

vs.

CITY OF REDDING; GARRETT
MAXWELL, an individual; MATTHEW
BRUCE, an individual; and DOES 2-10,
inclusive,

Defendants.

Case No. 2:22-cv-00585-WBS-JDP

Honorable William B. Shubb

JOINT STATEMENT OF THE CASE

Trial: September 10, 2024

**TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF
RECORD:**

Plaintiffs VERONICA MCLEOD, individually and as successor in interest to decedent,
DOLORES HERNANDEZ and AMADO HERNANDEZ, individually and as successor in interest
to decedent, DOLORES HERNANDEZ (“Plaintiffs”), and Defendants CITY OF REDDING and
GARRETT MAXWELL, and MATTHEW BRUCE (“Defendants”) (collectively “the Parties”),
by and through their counsel of record, hereby submit their Joint Statement of the Case pursuant to
the Court’s July 3, 2024, Final Pretrial Order,

Respectfully submitted,

DATED: August 20, 2024

**LAW OFFICES OF DALE K. GALIPO
LAW OFFICE OF STEWART KATZ**

By /s/ Hang D. Le

Dale K. Galipo
Stewart Katz
Hang D. Le
Attorneys for Plaintiffs
VERONICA MCLEOD, AMADO HERNANDEZ,
and YSIDRA REGALDO

DATED: August 20, 2024

**ALLEN, GLAESSNER, HAZELWOOD
& WERTH, LLP**

By /s/ Dale L. Allen, Jr. (as auth. 8/20/2024)

Dale L. Allen, Jr.
Ameet Patel
Attorneys for Defendants
CITY OF REDDING, GARRET MAXWELL, and
MATTHEW BRUCE

JOINT STATEMENT OF THE CASE

This case arises out of a December 2, 2020, encounter between Dolores Hernandez and City of Redding police officers during which Dolores Hernandez died. The plaintiffs are Dolores Hernandez's adult children, Veronica McLeod and Amado Hernandez. The defendants are the City of Redding and City of Redding police officers Garret Maxwell and Matthew Bruce.

The plaintiffs contend that Officer Maxwell and Officer Bruce unreasonably detained Dolores Hernandez and used unreasonable force against her, including deadly force. The plaintiffs also contend that Officer Maxwell and Officer Bruce were negligent in their conduct towards Dolores Hernandez. The plaintiffs are seeking damages as permitted by law.

The defendants deny these claims. The defendants contend that Officer Maxwell and Officer Bruce's seizure of Dolores Hernandez and subsequent uses of force against her were reasonable under the circumstances.